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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

**GOVERNMENT'S SECOND
AMENDED PROPOSED VERDICT
FORM**

**NEGASI ISHAIAH ZUBERI, aka
JUSTIN JOSHUA HYCHE,**

Defendant.

Upon further review of relevant case law, the government proposes the attached second amended verdict form that asks the jury to make factual findings about the locations from which the firearms and ammunition charged in each count were recovered.

Dated: October 17, 2024

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Suzanne Miles
SUZANNE MILES
Assistant United States Attorney

Government's Second Amended Proposed Verdict Form

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

VERDICT

**NEGASI ISHAIAH ZUBERI, aka
JUSTIN JOSHUA HYPHE**

We, the jury, being duly empaneled and sworn, hereby unanimously find **NEGASI ISHAIAH ZUBERI, aka JUSTIN JOSHUA HYPHE**, as follows:

**Count 1
Kidnapping**

_____ Not Guilty

_____ Guilty

If you checked "Guilty", you must choose at least one of the following to explain which type(s) of conduct your verdict is based on:

(Please check all that apply)

_____ Defendant transported AV1 across state lines from Washington to Oregon

_____ Defendant traveled in interstate commerce in committing, or in furtherance of, the offense

_____ Defendant used any means, facility, or instrumentality of interstate commerce in committing or furtherance of the offense

**Count 2
Transportation for Criminal Sexual Activity**

_____ Not Guilty

_____ Guilty

Count 3
Kidnapping

_____ Not Guilty

_____ Guilty

Count 4
Felon in Possession of a Firearm and Ammunition

_____ Not Guilty

_____ Guilty

If you checked "Guilty": Do you find that the firearm and/or round[s] of ammunition was/were recovered from AV1:

_____ No

_____ Yes

Count 5
Felon in Possession of a Firearm and Ammunition

_____ Not Guilty

_____ Guilty

If you checked "Guilty": Do you find that the firearm[s] and/or round[s] of ammunition was/were recovered from the Prowler trailer:

_____ No

_____ Yes

Count 6
Felon in Possession of Ammunition

_____ Not Guilty

_____ Guilty

If you checked "Guilty": Do you find that the round[s] of ammunition was/were recovered from a bedroom in the 1336 North Eldorado Avenue home:

_____ No

_____ Yes

Count 7
Felon in Possession of Ammunition

_____ Not Guilty

_____ Guilty

If you checked "Guilty": Do you find that the round[s] of ammunition was/were recovered from a garage in the 1336 North Eldorado Avenue home:

_____ No

_____ Yes

Dated: October _____, 2024

PRESIDING JUROR